

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI**

Brian Rekoske, individually and on behalf of all others similarly situated, Plaintiff, v. Navvis & Company, LLC d/b/a Navvis, Defendant.	Case No. 4:24-cv-00029-AGF
Maxwell Klassen, individually and on behalf of all others similarly situated, Plaintiff, v. Navvis & Company, LLC d/b/a Navvis, Defendant.	Case No. 4:24-cv-00035-RHH
Melanie Burns, individually and on behalf of all others similarly situated, Plaintiff, v. Navvis & Company, LLC d/b/a Navvis, Defendant.	Case No. 4:24-cv-00039-SRW
Julie Montiel, individually and on behalf of all others similarly situated, Plaintiff, v. Navvis & Company, LLC d/b/a Navvis, Defendant.	Case No. 4:24-cv-00040-AGF

Patricia McCreary, individually and on behalf of all others similarly situated, Plaintiff, v. Navvis & Company, LLC d/b/a Navvis, Defendant.	Case No. 4:24-cv-00041-MTS
Richard Lilly, individually and on behalf of all others similarly situated, Plaintiff, v. Navvis & Company, LLC, Defendant.	Case No. 4:24-cv-00063-SEP

PLAINTIFFS' MOTION TO CONSOLIDATE RELATED CASES

Plaintiffs Brian Rekoske, Maxwell Klassen, Melanie Burns, Julie Montiel, and Patricia McCreary, and Richard Lilly (“Plaintiffs”), individually and on behalf of all others similarly situated, respectfully move under Federal Rule of Civil Procedure (“Rule”) 42(a)(2) for an order consolidating the above-captioned actions: *Brian Rekoske v. Navvis & Company, LLC d/b/a Navvis*, No. 4:24-cv-00029-AGF (E.D. Mo.); *Maxwell Klassen v. Navvis & Company, LLC d/b/a Navvis*, No. 4:24-cv-00035-RHH (E.D. Mo.); *Melanie Burns v. Navvis & Company, LLC d/b/a Navvis*, No. 4:24-cv-00039-SRW (E.D. Mo.); *Julie Montiel v. Navvis & Company, LLC d/b/a Navvis*, No. 4:24-cv-00040-AGF (E.D. Mo.); *Patricia McCreary v. Navvis & Company, LLC d/b/a Navvis*, No. 4:24-cv-00041-MTS (E.D. Mo.); *Richard Lilly v. Navvis & Company, LLC*, No. 4:24-cv-00065-SEP (collectively, the “Related Actions”) and all other actions (now and in the future) naming Navvis & Company, LLC (“Navvis” or “Defendant”) as a defendant in connection with

the Data Breach Defendant experienced between July 12 and July 25, 2023 (the “Data Breach”). Plaintiffs respectfully request that the Court consolidate the Related Actions under the docket number of the first filed case, 4:24-cv-00029-AGF, and under the title *In re Navvis & Company, LLC Data Breach Litigation*.

This Motion is based on the accompanying Memorandum of Law, the exhibits attached thereto, any argument presented to the Court, and all matters of which the Court may take judicial notice.

Dated: January 12, 2024

Respectfully submitted,

/s/ Tiffany Marko Yiatras

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**Pro Hac Vice either forthcoming or pending*

CERTIFICATE OF SERVICE

I hereby certify that, on January 12, 2024, I electronically filed the foregoing with the Clerk of the Court by using the e-filing system which will send notification of such filing to all attorneys of record and ***further*** certify that I will serve the foregoing upon Defendant's Counsel upon their filing of an entry of appearance in this matter.

Date: 1/12/2024

By: /s/ Tiffany Marko Yiatras
Tiffany Marko Yiatras